

# Exhibit 74

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

JOANNE ANDERSON and  
GARY ANDERSON,

Plaintiffs,

vs.

BORG-WARNER CORPORATION by  
its successor-in-interest  
BORG-WARNER MORSE TEC,  
INC., et al.,

Defendants.

CAROLYN WEIRICK and ELVIRA  
GRACIELA ESCUDERO LORA,

Plaintiffs,

vs.

BRENTAG NORTH AMERICA,  
INC., etc., et al.,

Defendants.

Case No.

JCCP 5674/BC666513

Case No.

JCCP 4674/BC656425

DEPOSITION OF

WILLIAM E. LONGO, PhD

March 29, 2018  
10:00 a.m.

11340 Lakefield Drive  
Suite 200  
Johns Creek, Georgia

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<p>1 INDEX TO EXAMINATIONS</p> <p>2</p> <p>3 <u>Examination</u> <u>Page</u></p> <p>4</p> <p>5 Examination by Mr. Bailey 7</p> <p>6 Examination by Mr. Krasinski 93</p> <p>7 Examination by Mr. Massenburg 154</p> <p>8</p> <p>9 - - -</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>Atlanta Reporters, Inc. 866-344-0459 www.atlanta-reporters.com</p>	<p>1 (Reporter disclosure made pursuant to</p> <p>2 Article 10.B. of the Rules and Regulations of</p> <p>3 the Board of Court Reporting of the Judicial</p> <p>4 Council of Georgia.)</p> <p>5 WILLIAM E. LONGO, PhD,</p> <p>6 having been first duly sworn, was examined and</p> <p>7 testified as follows:</p> <p>8 EXAMINATION</p> <p>9 BY MR. BAILEY:</p> <p>10 Q. Good morning, Dr. Longo.</p> <p>11 A. Good morning, Mr. Bailey. How are you?</p> <p>12 Q. I'm great. Thank you. I'm here for</p> <p>13 Johnson &amp; Johnson Consumer Products. I mentioned</p> <p>14 that to you earlier; correct?</p> <p>15 A. Yes, sir.</p> <p>16 Q. I'm here to take your deposition in Joanne</p> <p>17 Anderson and Carolyn Weirick. Do you understand</p> <p>18 that?</p> <p>19 A. I do.</p> <p>20 Q. Can you give me a little bit of</p> <p>21 information about what preparation work you did,</p> <p>22 let's take the Anderson case specifically, to prepare</p> <p>23 for your deposition today?</p> <p>24 A. I read her three volumes of testimony --</p> <p>25 is it three? I think it was three, either two or</p> <p>Atlanta Reporters, Inc. 866-344-0459 www.atlanta-reporters.com</p>
<p>1 INDEX TO EXHIBITS</p> <p>2</p> <p>3 Defendant's <u>Exhibit</u> <u>Description</u> <u>Page</u></p> <p>4</p> <p>5 1 Anderson deposition and trial 61</p> <p>6 2 Cover letter of 3/14/2018 and 61</p> <p>7 subpoenas</p> <p>8 3 Handwritten notes by Longo for 63</p> <p>9 Anderson</p> <p>10 4 Handwritten notes by Longo for 63</p> <p>11 Weirick</p> <p>12 5 Cover letter of 3/21/2018 from SGPB 63</p> <p>13 to Longo</p> <p>14 6 Report of 2/8/2018 by Lee Poye of 66</p> <p>15 J3 Resources</p> <p>16 7 PowerPoint: Adding TEM to the 69</p> <p>17 Global Talc Specification</p> <p>18 (McCarthy)</p> <p>19 8 J&amp;J memo of 8/9/1973 re: FDA phone 72</p> <p>20 call</p> <p>21 9 Longo file in Weirick case 86</p> <p>22 10 MAS Analyses on talc in Anderson 87</p> <p>23 case</p> <p>24 11 ASTM D5755, Standard Test Method 121</p> <p>25 for Microvacuum Sampling and</p> <p>Indirect Analysis of Dust by</p> <p>Transmission Electron Microscopy</p> <p>for Asbestos Structure Number</p> <p>Surface Loading</p> <p>(A disk(s) containing scanned copies of</p> <p>Exhibits 1 through 11 have been attached to the</p> <p>original transcript, the originals having been</p> <p>retained by Dr. Longo.)</p> <p>Atlanta Reporters, Inc. 866-344-0459 www.atlanta-reporters.com</p>	<p>8</p> <p>10:04:47 1 three -- I have them -- and I read her husband's</p> <p>10:04:50 2 testimony.</p> <p>10:04:50 3 Q. About how much time do you think you have</p> <p>10:04:52 4 in preparing for that part of this deposition?</p> <p>10:04:58 5 A. It was around 500, 600 pages. Somewhere</p> <p>10:05:02 6 around seven to eight hours plus some brief</p> <p>10:05:06 7 calculations on potential amount of bottles she may</p> <p>10:05:11 8 have encountered during her -- children during</p> <p>10:05:16 9 diapering and her bowling, maybe ten hours, eight to</p> <p>10:05:23 10 ten, somewhere around there.</p> <p>10:05:24 11 Q. We'll set aside the fact that you have</p> <p>10:05:26 12 examined two of the bottles that she provided to her</p> <p>10:05:30 13 attorneys; correct?</p> <p>10:05:30 14 A. Correct.</p> <p>10:05:31 15 Q. Okay. So setting that time aside, have</p> <p>10:05:34 16 you done anything else to prepare for this part of</p> <p>10:05:37 17 the deposition?</p> <p>10:05:37 18 A. I mean, I went through a list of files or</p> <p>10:05:44 19 studies and files and materials that I would be</p> <p>10:05:50 20 relying on, just general overview, you know, another</p> <p>10:05:54 21 few hours.</p> <p>10:05:55 22 Q. Have you done any or made any attempt to</p> <p>10:05:59 23 calculate any exposure levels that Ms. Anderson may</p> <p>10:06:02 24 have had as a result to any products in this case?</p> <p>10:06:05 25 A. I calculated out how many potential</p> <p>Atlanta Reporters, Inc. 866-344-0459 www.atlanta-reporters.com</p>

10:58:21 **1** aspect ratios are for what they call nonasbestos  
 10:58:24 **2** tremolite.  
 10:58:25 **3** Q. I lost -- I got lost somewhere in there  
 10:58:28 **4** because the question is had someone asked you to take  
 10:58:33 **5** one further step and answer whether or not this is  
 10:58:38 **6** asbestiform or not that you're looking at, I'll just  
 10:58:41 **7** ask the simple question could you?  
 10:58:44 **8** A. I would say with the data we have now,  
 10:58:47 **9** it's all asbestiform.  
 10:58:48 **10** Q. All of it?  
 10:58:49 **11** A. Everything that's above 5:1 aspect ratio,  
 10:58:54 **12** it meets Blount's definition, it matches the NIST  
 10:59:01 **13** tremolite standard, it matches the Campbell  
 10:59:04 **14** definition, so I guess I'm leaning there.  
 10:59:06 **15** I don't know if I would say within a  
 10:59:08 **16** reasonable degree of scientific certainty, but if you  
 10:59:09 **17** want to look at a population, you know, we're looking  
 10:59:11 **18** at almost 300 particles out of all these talcs, so  
 10:59:15 **19** why wouldn't they all be -- they're all asbestos.  
 10:59:19 **20** Q. I just want to make sure I have you on the  
 10:59:21 **21** record for this. And your testimony is every fiber  
 10:59:24 **22** you've looked at that you've described as an  
 10:59:27 **23** amphibole is asbestiform in these studies?  
 10:59:29 **24** A. I'm leaning towards that way because we're  
 10:59:33 **25** building a population of fibers that we're looking  
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 10:59:35 **1** at, fibers and bundles.  
 10:59:36 **2** I have given the testimony that anything  
 10:59:38 **3** we -- anytime we see a bundle, in my opinion it's  
 10:59:42 **4** asbestiform. I've given that over and over.  
 10:59:46 **5** Now we're looking at just regular fibers.  
 10:59:47 **6** If the regular fibers fit in the aspect ratio of what  
 10:59:51 **7** Blount calls asbestos, then I'm saying it's all  
 10:59:54 **8** asbestos, as well as the counting rules.  
 10:59:56 **9** Is that enough of a population to make  
 11:00:00 **10** Sanchez happy, since they're pushing the it's all  
 11:00:05 **11** nonasbestiform and not a problem, like the Libby,  
 11:00:08 **12** Montana, was all nonasbestiform and not a problem?  
 11:00:12 **13** Let's see. What other mines did they get into and  
 11:00:15 **14** say it was all nonasbestiform and not a problem? It  
 11:00:18 **15** seems to be -- at least in my opinion, it seems to be  
 11:00:21 **16** an effort from the group to make it all  
 11:00:24 **17** nonasbestiform.  
 11:00:25 **18** What we're looking at is here's the  
 11:00:26 **19** counting rules, it's asbestos, all the bundles are  
 11:00:30 **20** asbestos, are all asbestiform, according -- because  
 11:00:35 **21** it's unclear to me how, when you break up rock  
 11:00:37 **22** pieces, that you can form bundles.  
 11:00:40 **23** Q. You understand I'm going to object to that  
 11:00:43 **24** as nonresponsive. You got it off your chest, but I'm  
 11:00:45 **25** going to object to it.  
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11:00:46 **1** A. Not off my chest. It's my opinion.  
 11:00:49 **2** Q. I have you down that your opinion is every  
 11:00:53 **3** fiber you've identified in any of these studies is  
 11:00:57 **4** asbestiform, and I'll move on. Okay?  
 11:00:59 **5** A. I said I'm getting there, that we're  
 11:01:02 **6** building up a population of positive samples where  
 11:01:05 **7** we're looking at the aspect ratio and how it matches  
 11:01:08 **8** up to what Blount says as well as what Campbell says.  
 11:01:11 **9** Certainly it's all asbestos, by  
 11:01:13 **10** definition. Is every fiber asbestiform? Can you  
 11:01:16 **11** tell if it's a 5:1 aspect ratio?  
 11:01:18 **12** But I think as we build up this population  
 11:01:21 **13** of fibers -- and of course we have 80 MDL samples  
 11:01:25 **14** now, and we'll be working through those, and that  
 11:01:27 **15** will give us the different mines. You know, assuming  
 11:01:31 **16** that some percentage of them are positive, we can  
 11:01:34 **17** start building up a population of fibers versus the  
 11:01:37 **18** less than 5:1 aspect ratio and how that meets up with  
 11:01:42 **19** the Blount and Campbell chart.  
 11:01:44 **20** Q. I don't want to go through this in any  
 11:01:49 **21** huge detail. There's a difference in the methodology  
 11:01:51 **22** Blount uses in testing and the methodology you used  
 11:01:56 **23** here. That's not a matter of serious dispute, is it?  
 11:02:00 **24** A. Well, she used polarized light microscopy,  
 11:02:02 **25** but she's used the Blount -- I'm calling it the  
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 11:02:05 **1** Blount liquid density method, but it's obviously an  
 11:02:09 **2** ISO method too for heavy density liquid, and she did  
 11:02:13 **3** PLM and then she did what her size distribution was.  
 11:02:16 **4** Our size distribution matches pretty well  
 11:02:18 **5** except on the tail end. So we have a chart of what's  
 11:02:26 **6** said, here's what's in cosmetic talc, here's what I  
 11:02:28 **7** found, she compared it to Campbell, Campbell says  
 11:02:32 **8** this is what the aspect ratio is on tremolite  
 11:02:34 **9** asbestos, and our aspect ratios -- peak aspect ratios  
 11:02:39 **10** are slightly higher than that. I can only conclude  
 11:02:42 **11** if you look at all our aspect ratios for what's been  
 11:02:45 **12** used so far, it matches all asbestos for their two  
 11:02:48 **13** charts.  
 11:02:48 **14** Q. But you know that my question was you  
 11:02:51 **15** didn't use the identical methodology that she used.  
 11:02:54 **16** That was my only question.  
 11:02:55 **17** A. No, we didn't use the identical  
 11:02:58 **18** methodology.  
 11:02:59 **19** Q. Okay.  
 11:02:59 **20** A. But we got almost identical results.  
 11:03:10 **21** Q. So did you have any discussion at all with  
 11:03:12 **22** Mr. Lanier or Mr. Panatier or anybody as a part of  
 11:03:16 **23** this process about answering the question in your  
 11:03:21 **24** report about whether this is asbestiform or not, or  
 11:03:24 **25** was it just never discussed?  
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11:03:25 **1 A. I didn't get any directions from**  
 11:03:28 **2 Mr. Panatier or Mr. Satterley or Mr. Lanier. I have**  
 11:03:33 **3 just been going along, and as things come up, we**  
 11:03:37 **4 research, do work on it, you know, we're doing more**  
 11:03:40 **5 and more work. I've testified in the past that if**  
 11:03:43 **6 it's a bundle, it's asbestiform; and if you're just**  
 11:03:47 **7 looking at single fibers, you can't tell.**  
 11:03:49 **8 Q. And what are the limitations of TEM in**  
 11:03:52 **9 connection with answering that question?**  
 11:03:55 **10 A. TEM is looking at the single fiber, single**  
 11:03:59 **11 bundles, and there's no way to tell with just TEM, if**  
 11:04:04 **12 you're looking at a single fiber, if it's asbestiform**  
 11:04:07 **13 or not.**  
 11:04:07 **14 Q. Well, if it is the bundle that you say**  
 11:04:10 **15 makes them, in part, asbestiform, can you and I agree**  
 11:04:14 **16 you're not seeing that on TEM?**  
 11:04:16 **17 A. Seeing bundles all the time. I mean, half**  
 11:04:21 **18 to three quarter of what we find are actually**  
 11:04:25 **19 bundles.**  
 11:04:25 **20 I think I heard somewhere somebody**  
 11:04:27 **21 testified you can't tell that there's a bundle in**  
 11:04:29 **22 TEM. Every TEM counting protocol has the definition**  
 11:04:32 **23 for bundles, so it certainly is something that is**  
 11:04:35 **24 routinely observed, acknowledged, and written down in**  
 11:04:40 **25 TEM analysis.**  
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11:04:40 **1 Q. Let's just stay with what you've testified**  
 11:04:43 **2 to in this litigation and see if that's changed.**  
 11:04:46 **3 Do you hold the opinion that based upon**  
 11:04:48 **4 the testing you've done, you could not say to a**  
 11:04:54 **5 reasonable degree of scientific certainty that any**  
 11:04:57 **6 particular fiber you've identified was asbestiform?**  
 11:05:00 **7 Have you said that so far in your testimony?**  
 11:05:04 **8 A. I may have.**  
 11:05:06 **9 Q. Okay. Would you ever write a report that**  
 11:05:14 **10 described tremolite as asbestiform versus not**  
 11:05:19 **11 commenting at all?**  
 11:05:20 **12 A. I don't know.**  
 11:05:21 **13 Q. You told me earlier that was more a**  
 11:05:23 **14 question for geology.**  
 11:05:26 **15 A. No, it's not a question for geology. This**  
 11:05:29 **16 whole asbestiform and nonasbestiform is nothing more**  
 11:05:31 **17 than a geological commercial term for the grade of**  
 11:05:35 **18 asbestos found in any particular mine. The more,**  
 11:05:39 **19 quote, asbestiform it is, the more fibrous habitat,**  
 11:05:42 **20 the more cross fiber, the more it's worth to whoever**  
 11:05:45 **21 owns the mine. That's where this came from.**  
 11:05:48 **22 It's been -- now it's trying -- and now**  
 11:05:51 **23 it's creeping into the actual -- people are trying to**  
 11:05:54 **24 use it in fibers, in bundles, and what we find in**  
 11:05:58 **25 accessory minerals, it's not appropriate for that.**  
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11:06:01 **1 Q. Have you ever done -- well, strike that.**  
 11:06:07 **2 It sounds to me as though you are**  
 11:06:09 **3 confident that you're familiar with when and how this**  
 11:06:12 **4 debate of asbestiform came to being; correct?**  
 11:06:18 **5 A. Correct.**  
 11:06:18 **6 Q. Have you ever gone back and looked at the**  
 11:06:21 **7 literature over the last 75 years to see whether or**  
 11:06:24 **8 not the issue of asbestiform was written on back**  
 11:06:28 **9 then?**  
 11:06:28 **10 A. Not so much that it's written, but I've**  
 11:06:31 **11 looked at the questions I have received, like, for**  
 11:06:35 **12 example, you didn't determine the tensile strength**  
 11:06:39 **13 because asbestiform has high tensile strength.**  
 11:06:42 **14 Well, chrysotile has high tensile**  
 11:06:46 **15 strength. Amosite has high tensile strength.**  
 11:06:49 **16 Crocidolite has high tensile strength. Tremolite and**  
 11:06:54 **17 anthophyllite do not, as compared to the others. And**  
 11:06:57 **18 the TEM is absolutely impossible to determine the**  
 11:07:01 **19 tensile strength.**  
 11:07:01 **20 Q. Okay.**  
 11:07:02 **21 A. In a PLM sample it is absolutely**  
 11:07:04 **22 impossible to determine the tensile strength. You**  
 11:07:06 **23 have to take a sample out of the mine. So I've gone**  
 11:07:09 **24 back and looked at other papers where they talked**  
 11:07:12 **25 about we did tensile strength because we were heat**  
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11:07:18 **1 treating amosite and we wanted to know if it lost its**  
 11:07:20 **2 strength.**  
 11:07:20 **3 Well, how did they test it? They had big,**  
 11:07:22 **4 long pieces that they cut out from a mine sample and**  
 11:07:25 **5 put in an angstrom.**  
 11:07:26 **6 What does it mean that it's more fibrous**  
 11:07:28 **7 and it has this, you know, 1:20, 1:100 average aspect**  
 11:07:33 **8 ratio? Well, if you go to the Ontario Mining**  
 11:07:37 **9 Association and you look at their grading of**  
 11:07:39 **10 chrysotile, you can see why it's important, because**  
 11:07:43 **11 crude number 2 is \$1,200 a ton. 3D is \$749 a ton.**  
 11:07:50 **12 7M is \$49 a ton. It's all about what the mine is**  
 11:07:54 **13 worth.**  
 11:07:55 **14 Q. So you've read all that, but you've never**  
 11:07:57 **15 encountered any of the articles that talk about the**  
 11:08:00 **16 medical significance in the differences?**  
 11:08:02 **17 A. I don't get involved in the medical**  
 11:08:04 **18 significance. I get involved in what's present in**  
 11:08:09 **19 the counting rules that we use to define what's**  
 11:08:11 **20 present.**  
 11:08:12 **21 Q. You know I don't like to debate with you.**  
 11:08:15 **22 You don't get involved in the cost of**  
 11:08:18 **23 asbestos either, but you seem to have a strong**  
 11:08:20 **24 opinion about it.**  
 11:08:21 **25 A. It's not so much a strong opinion. It was**  
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**C E R T I F I C A T E**

STATE OF GEORGIA:  
 COUNTY OF GWINNETT:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the questions and answers thereto were reduced to typewriting under my direction; that the foregoing pages 1 through 192 represent a true, complete, and correct transcript of the evidence given upon said hearing, and I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I in anywise interested in the result of said case.

This, the 5th day of April 2018.

DEBRA R. LUTHER, B-881  
 Georgia Certified Court Reporter

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**DEPOSITION OF WILLIAM E. LONGO, PhD /DRL**

I do hereby certify that I have read all questions propounded to me and all answers given by me on the 29th day of March 2018, taken before Debra R. Luther, and that:

1) There are no changes noted.  
 2) The following changes are noted:

Pursuant to Rule 30(e) of the Federal Rules of Civil Procedure and/or the Official Code of Georgia Annotated 9-11-30(e), both of which read in part: Any changes in form or substance which you desire to make shall be entered upon the deposition...with a statement of the reasons given...for making them. Accordingly, to assist you in effecting corrections, please use the form below:

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**DEPOSITION OF WILLIAM E. LONGO, PhD /DRL**

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If supplemental or additional pages are necessary, please furnish same in typewriting annexed to this deposition.

WILLIAM E. LONGO, PhD  
 Sworn to and subscribed before me,  
 This, the \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_.

Notary Public  
 My commission expires: \_\_\_\_\_

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